

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Wireless E911 Location Accuracy Requirements)	PS Docket No. 07-114
)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	
)	
Association of Public-Safety Communications)	
Officials-International, Inc. Request for)	
Declaratory Ruling)	
)	
911 Requirements for IP-Enabled Service Providers)	WC Docket NO. 05-196
)	

COMMENTS OF THE CITY OF LOS ANGELES

I. INTRODUCTION

The City of Los Angeles provides these comments regarding the above captioned matters addressed in the Notice of Proposed Rulemaking, FCC 94-102, adopted by the Commission on May 31, 2007.

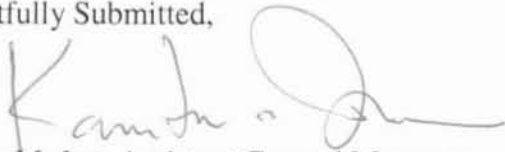
II. DISCUSSION

1. The City of Los Angeles Police and Fire Departments are operating two large Public Safety Answering Points (PSAPs) that provide emergency services to the 9-1-1 callers in areas which cover approximately 469 square miles of City limits. Accurate information to pinpoint a population over 3.8 million people for the 9-1-1 callers' is critical to our PASAs' ability to respond to the 9-1-1 calls in a timely manner. The Commission's wireless E9-1-1 rules require carriers to provide PSAP with the location of 9-1-1 calls. Clarification is needed to Section 20.18(h), 47 C.F.R. § 20.18 (h), regarding the geographic area over which a wireless carrier must provide the level and degree of 9-1-1 location accuracy. The City concurs with APCO on the issue of not basing the accuracy level on various sized carrier service areas.
2. With the ever changing cellular technologies and its marketing landscapes, periodical updates of the 9-1-1 location data to ensure its accuracy is crucial.

III. CONCLUSION

The City of Los Angeles concurs with Association of Public-Safety Communications Officials-International, Inc. (APCO)'s request and respectfully requests the Commission rules in favor of the APCO's petition in the best interests of the Public Safety needs.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read 'Kamton M. Joe', with a large, stylized loop at the end.

Kamton M. Joe, Assistant General Manager
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